

Mera Matthews
Alaska Bar No. 0605020
John Cashion
Alaska Bar No. 9806025
CASHION GILMORE LLC
1007 W. 3rd Avenue, Suite 301
Anchorage, AK 99501
Telephone: (907) 222-7932
Facsimile: (907) 222-7938
Emails: mera@cashiongilmore.com
john@cashiongilmore.com

Attorneys for Andrea Lauria

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANDREA LAURIA,

Plaintiff,

vs.

UNITED STATES OF AMERICA and
CHRIS HEITSTUMAN,

Defendants.

Case No. 3:20-cv-00210-SLG

**MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT WITH
CONSENT OF OPPOSING PARTY PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 15(a)(2) and 21**

COMES NOW Plaintiff Andrea Lauria, by and through counsel Cashion
Gilmore, and moves to amend the complaint pursuant to Federal Rule of Civil

Procedure 15(a)(2). Opposing counsel has consented to this filing in writing via email dated October 30, 2020.¹

Civil Rule 15 provides that leave to amend pleadings should be freely granted. No responsive pleadings have been filed in this matter to date and no discovery has been conducted. The parties will not suffer prejudice as a result of this amendment. Pursuant to Local Civil Rule 15.1 the Second Amended Complaint is attached to this filing and indicates how it differs from the pleading it amends by striking through the text to be deleted and underlining the text to be added.² Upon issuance of an order granting Plaintiff's Motion for Leave to File Second Amended Complaint a clean copy of the Second Amended Complaint will be filed.

DATED this 2nd day of November 2020, at Anchorage, Alaska.

CASHION GILMORE LLC
Attorneys for Andrea Lauria

/s/ Mera Matthews

Mera Matthews
Alaska Bar No. 0605020
John P. Cashion
Alaska Bar No. 9806025

¹ See attached Ex. 1, Email from Seth Beausang dated October 30, 2020.

² Ex. 2, Second Amended Complaint.

CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy of the foregoing was served electronically on November 2, 2020 via the Court's CM/ECF system on the following:

Marie Scheperle
Marie.Scheperle@usdoj.gov

Seth Beausang
seth.beausang@usdoj.gov

CASHION GILMORE LLC

By: s/ Mera Matthews